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June 23, 2023

Via ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Yanping Wang, S1 1:23-cr-00118-AT

Dear Hon. Judge Torres:

Along with Lipman Law PLLC, we represent Ms. Yanping Wang in the above-referenced matter. On June 5, 2023, Ms. Wang filed her bail application (ECF No. 81) and on June 6, 2023, the Court set a briefing schedule for the government's opposition to Ms. Wang's bail application (which was due and filed on June 20, 2023, ECF No. 89) and Ms. Wang's reply to the government's application, which is currently due on June 28, 2023. We respectfully request a three-day extension to file Ms. Wang's reply, which would change the filing date to June 30, 2023.

The reasons for our request are: 1) the government's opposition contains entirely new factual allegations (including obstruction of justice) against Ms. Wang, 2) because Ms. Wang is in custody and counsels' schedule, today was the first day we were able to meet with her to discuss these new allegations, and 3) we need additional time to investigate these new allegations so we can effectively respond to them. This is our first request for an extension to file Ms. Wang's reply. The government does not object to this request. The requested adjournment will not affect any other scheduled date in this matter.

We thank Your Honor in advance for Your courtesy.

Respectfully submitted,

GRANTED.

SO ORDERED.

Dated: June 26, 2023
New York, New York



ANALISA TORRES
United States District Judge